

United States Environmental Protection Agency
Region IV
POLLUTION REPORT

Date: Friday, February 25, 2011
From: Terry Stilman, On Scene Coordinator

To: Matt Taylor, USEPA R4 ERRB Jim Webster, USEPA R4 ERRB

Subject: Continued Removal Action
Gulf States Steel
2800 Norris Ave, Gadsden, AL
Latitude: 34.0119000
Longitude: -86.0469000

POLREP No.:	26	Site #:	A499
Reporting Period:	1/21/2011 - 2/20/2011	D.O. #:	
Start Date:	8/1/2007	Response Authority:	CERCLA
Mob Date:	8/1/2007	Response Type:	Time-Critical
Demob Date:		NPL Status:	Non NPL
Completion Date:		Incident Category:	Removal Action
CERCLIS ID #:	ALD004014973	Contract #	
RCRIS ID #:			

Site Description

Gulf States Steel, Inc. began operations at the site on February 1, 1986, although the facility was previously operated and owned by other entities since its construction since 1902. Gulf States Steel was a fully integrated steel manufacturing facility that manufactured a diversified product line including steel plates, hot and cold rolled steel sheets, and galvanized steel sheets. Major process operations occurred at the coke and by-product plant, the blast furnace area, and at the basic oxygen plant. The coke and by-product plant at the Gulf States Steel site produced metallurgical coke, and coke oven gas, coal tar, ammonium sulfate, light oil, and naphthalene through the distillation of coal with a high volatile organic content in the absence of air. There are four waste oil lagoons which are unlined surface impoundments that were apparently used to reclaim waste oil from wastewaters generated by steel finishing processes.

On January 22, 2007, EPA conducted a Site Assessment at the Site, by RPM Jordan Garrard. During site assessment several items were observed including bulging drums, leaking aboveground storage tanks (ASTs) containing listed hazardous wastes, and oil spills. RPM contacted the Removal Section of the ERRB to initiate a Removal Site Evaluation (RSE). RPM Garrard continued with site assessment activities, including waste stream sampling of drums and ASTs, and surficial soils in the coke plant area. On February 21, 2007, OSC Randy Nattis conducted a RSE. Based on analytical results from waste stream samples and field observations; including unsecured drums, leaking ASTs, and evidence of trespassing, the Site was found to pose an immediate hazard to human health and the environment. A Time-Critical Removal Action began in September 2009 to address the hazards associated with the Powerhouse, lagoons and Slag Piles.

Remaining work has focussed on two slag piles. The slag piles are the source of continued release of characteristic hazardous waste. The caustic leachate containing pH values as high as 12.5 from the slag piles is directly discharging into Black Creek, an adjacent wetland area, and a residential neighborhood from drainage ditches outside the Site fence. Sloughing of slag from the piles has been observed on both the northern and southern piles. The sloughing allows for the production of more leachate due to the increase in surface area of new unweathered slag.

Current Activities

Slag processing from both the North and South piles continues. Material from both piles is transported to an on-site processing facility for separation. Recyclable material is transported off-site. Non-recyclable material is moved to an area close to the North pile for consolidation and capping to halt the further production of high pH leachate.

Leachate coming from slag piles is currently being monitored for pH. Air monitoring for particulates is also conducted during operations.

ERRS continues to move the top portion of the North pile directly to the on-site landfill, thereby reducing the amount of space needed for landfill creation and increasing the Site productivity.

USCG GST on-site to assist with ERRS and START contractor oversight.

Planned Removal Actions

Slag screening, reclamation and leachate reduction operations will continue.

An additional processing plant (the original pilot plant) will be moved closer to the South pile to allow for simultaneous processing of both piles (anticipated March 14).

Next Steps

As changes are made, activities will continue to be monitored to determine the optimal effectiveness.

Key Issues

As the dry season approaches, duct control will be a major focus.

Estimated Costs *

	Budgeted	Total To Date	Remaining	% Remaining
Extramural Costs				
ERRS - Cleanup Contractor	\$15,181,940.00	\$7,190,039.00	\$7,991,901.00	52.64%
IAGs - USCG GST	\$479,170.00	\$240,389.00	\$238,781.00	49.83%
RST/START	\$1,329,985.00	\$1,010,839.00	\$319,146.00	24.00%
Intramural Costs				
Total Site Costs	\$16,991,095.00	\$8,441,267.00	\$8,549,828.00	50.32%

* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

response.epa.gov/GulfStatesSteel

POLREP #26 Last Updated 3/7/2011